

# Texas Water Commission

## INTEROFFICE MEMORANDUM

**TO :** BILL BROWN, Field Operations Liaison  
Hazardous and Solid Waste Division

**DATE:** February 7, 1986

**THRU :**

**FROM :** TIM SEWELL, Environmental Quality Specialist, District 4

**SUBJECT:** Consolidated Casting Corporation - Dallas, Texas  
Registration No. 30395

On January 16, 1986, the writer met with Mr. Sam Sims, Personnel Manager, Mr. Joe Hull, Safety Administrator, and Mr. Bill Carnes, Plant Manager and conducted an annual industrial solid waste compliance inspection.

The referenced facility manufactures precision metal castings.

The company submitted an EPA Part "A" Permit Application on November 7, 1980. To date, no Affidavit of Exclusion has been submitted to the Commission.

Although this facility has not submitted the required Affidavit of Exclusion required to withdraw the referenced EPA Part "A" Permit Application, records indicate that the company has never operated as an interim status facility. In the writer's opinion, this facility should be regulated as a 90-day generator pending the submission of the referenced affidavit.

### COMMENTS:

#### Section A - #4:

Hydrochloric acid (Waste #006) has never been generated as a hazardous waste. It is utilized as a product within the elementary neutralization system to neutralize sodium hydroxide solution prior to disposal in the City of Dallas sanitary sewerage system. Also, sodium hydroxide solution (Waste #007) should be described as a sludge with the Texas Waste Code # of 943210. The referenced waste is placed into 55-gallon drums as a wet sludge containing ceramic material (Class III) and sodium hydroxide (Class IH). All waste is allowed to evaporate, leaving a hard, dry sludge material. The drums are then capped and removed to the drum storage area. Waste disposition should remain on-site/off-site.

#### Section A #5:

On-site waste management facility #02 (tank) is an elementary neutralization unit and should be inactive.

The new facility contact person is Joe Hull; phone (214)241-2161. The new facility mailing address is Consolidated Casting Corporation, P.O. Box 29242, Dallas, Texas 75229.

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General Facilities Checklist:

Section B #1 - #4:

The facility does not maintain an adequate personnel training program or the required training records. As of this inspection the referenced program is in outline form only and no on-the-job training has been documented.

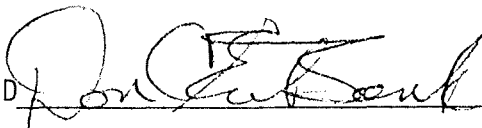
Section D #2:

The facility does not maintain an adequate contingency plan. As of this inspection, the referenced plan is in outline form only. Revisions should include the addresses and telephone numbers of the emergency coordinators, the locations of spill control equipment and additional detailed information regarding specific emergency response procedures. Also, copies of this contingency plan have not been submitted to the local authorities as required.

This is reported for your information.

TS:bb

APPROVED



SIGNED

